REMARKS

Claims 1, 3, 4, 5, 8, 16, 18, 28, 30, 32, 34, 35, 37, 42, 43, 44, 46, 52, 62, 64, 66, 68, 69 and 71 stand rejected under 35 U.S.C. 102(e) as being anticipated by Besaw et al. Besaw et al. merely discloses a graphic display of a network topology. The graphic shows nodes on a network and their connections. The connections are referred to as edges. (col. 2, lines 16-19). The only aspect of a connection between two nodes that appears of significance in Besaw et al. is the connection itself. The invention described by Besaw is an automatic layout system to perform the layout and display of a network. (col. 5, lines 22-25). The topology of connections and of nodes is analyzed by the software to determine, for example, if the initial cluster is in fact more than one cluster. (col. 6, lines 5-8). The program can temporarily remove edges from the graph and then perform a search that determines if by removing the edge the cluster can be subdivided. Thus, Besaw teaches a system for displaying and representing a computer network of nodes.

Besaw et al. does not disclose Applicants' invention including among other elements, in claim 1, the act of defining attributes of a relationship and perceived logical connection between data items. In a preferred embodiment of Applicants' invention, the attributes for a relationship between data items include categories, name of the relationship, and key words or notes that describe the nature of the relationship. (Application p. 14, l. 10-14). Referring now to Fig. 8c, a connection between data items may be selected to produce the screen shown in Fig. 8c so that the attributes may be defined by filling in a name, location, category, key words or annotations. Besaw merely displays a connection and does not disclose, suggest or teach defining attributes for a connection nor does it provide any incentive for one to include such a mechanism for associating attributes with such a connection. Moreover, since the computer network of Besaw et al. is a physical computer network with physical connections, it further differs from Applicants' invention which relates to "perceived logical connection" between data. Applicants' invention logically relates data items to one another, whereas Besaw merely discloses physical connections between computer nodes. For these reasons, claim 1 and all claims depending therefrom should be allowed.

Referring now to claim 3, Applicants' invention requires displaying at least partial content of the Master Facet when the attributes of the Master Facet are defined. Fig. 2c

shows one method of a preferred embodiment for defining the attributes of the Master Facet. The "view" portion of the screen allows simultaneously displaying at least partial content of the Master Facet. A "view" window with content displayed is shown in Fig. 8c. The examiner recites Besaw et al., on the other hand, as merely displaying the nodes and the connections between the nodes and the topology. There is no display of any content of the Master Facet in Fig. 2 of Besaw. For this additional reason, claim 3 should be allowed.

Claim 4 should also be allowed for these reasons. As with claim 3, Besaw merely discloses in Fig. 2 an illustration of the nodes and their connections. There is no display of at least partial content of any of the data items.

As shown in Fig. 8c of the application a preview window 36 allows for partial content of a data item to be displayed while defining attributes of the relationship. Such an act of displaying is not taught or suggested by Besaw et al. and for this additional reason claim 5 should be allowed.

As explained with regard to claim 1, Besaw et al. fails to disclose "defining attributes of said relationship and perceived logical connection between said data items." Thus, claim 8 should be allowed.

Claim 32 recites assigning attributes to a relationship. Claim 34 recites "defining attributes of a new relationship." As discussed above with respect to claim 1 these items are not found in the automatic layout system of Besaw. Thus, for the reasons above stated, claims 32 and 34 are allowable.

Independent claim 41 is not anticipated by Besaw et al. Moreover, the examiner does not raise such a rejection. In at least one particular, a "relationship having a plurality of attributes defined by the user" is not found in Besaw et al. Also, "the relationship and logical connection between said data items are arbitrarily defined by the user, based on user's perception of the connection of said items" is missing from Besaw et al. The examiner should not and probably does not reject claim 41 as anticipated. Given the fact that claim 41 is not anticipated, therefore, dependent claims 42, 43, 44, 46, 52, 62, 64, 66, 68, 69, and 71 are likewise not anticipated and should be allowed.

Claims 20-27 and 54-61 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Besaw et al. Claims 1 and 41 are not taught by Besaw for reasons set forth above. Moreover, Besaw teaches a graphic display of a network topology such that the links

between the elements are physical network connections. There is no suggestion, teaching or disclosure of defining attributes for the connections nor does Besaw suggest perceived logical connections. For these reasons, claims 20-27 and 54-61 should be allowed.

As to claims 20-27 and 54-61, the examiner specifically argues that the type of data object is not functionally involved in the steps recited. This is not correct. The type of data contributes to a user's ability to perceive logical connections and define attributes. Claim 1 calls for forming a relationship between said data items and also recites "defining attributes of said relationship and perceived logical connection between said data items." Besaw et al. merely discloses network nodes and connections for those nodes. Rather than teaching or disclosing data items that can form the basis for a relationship or a perceived logical connection, Besaw et al. merely discloses computer nodes. As such Besaw et al. is inapplicable to Applicants' invention.

There is a functional involvement between the methods set forth in claim 1 and the data items individually recited in the dependent claims. Whereas a logical connection may be made between a movie clip and an excerpt of text, it is not demonstrated how a perceived logical connection can be defined with respect to one computer with respect to a second computer. Applicants' invention significantly relates data items to one another whereas Besaw merely discloses physical connections between computer nodes. For these additional reasons, claims 20-27 and 54-61 should be allowed.

Claims 2, 6, 7, 9-15, 17, 39, 40, 41, 45, 47-51, 53, 73, and 74 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Besaw et al. in view of Hugh. As explained above Besaw does not teach all the limitations for claim 1. Moreover, Hugh does not satisfy the deficiencies of Besaw. While Hugh discloses the use of a dialogue box such as in Fig. 7 to define properties of a thought, there is no suggestion, disclosure or teaching of an ability to define attributes for a relationship. While Hugh discloses a hierarchy of relationships similar to the Master Facet and its cluster of related data items, there is no suggestion of defining attributes for a relationship such as taught by Applicants' and shown, for example in Fig. 8c of the present application. Thus, all limitations of claims 1 and 41 are not found in the combination of Besaw et al. and Hugh. For these reasons, claims 1 and 41 and all claims depending therefrom should be allowed.

In addition, given that neither Besaw nor Hugh disclose defining attributes for a relationship, likewise neither would have any reason to provide analysis of such a relationship. As set forth in claims 7, 10 and 14 Applicants' invention permits selection of a relationship to permit user analysis. The examiner does not refer to such analysis in Hugh, but rather, refers to severing a relationship. Hugh shows how to create or sever a relationship but fails to disclose defining attributes for a relationship and further allowing analysis of such attributes. For these additional reasons, claim 7, 10 and 14 should be allowed.

In addressing claim 11, the examiner conflates the creation of the relationship with defining attributes of the relationship. When Hugh creates a relationship he indicates which is a parent or a child or other such hierarchy connection. The examiner can correspond this parent/child relationship to Applicants' use of a Master Facet with respect to a data item. One might argue a Master Facet is a parent to the items clustered under it. The present invention though additionally defines attributes of a relationship. Once the relationship is set up by Hugh there is no suggestion, teaching or disclosure of being able to define attributes for that relationship. The ability to provide such things as key words or annotations or categories for the relationship that has been created is taught and claimed by Applicants' and is not found in the cited references.

Claim 41 recites a relationship having a plurality of attributes defined by the user. As explained fully above, neither Besaw nor Hugh describe defining attributes for a relationship. For these reasons, claim 41 and all claims depending therefrom should be allowed.

Claim 19 was rejected under 35 U.S.C. 103(a) as being unpatentable over Besaw in view of Sexena. As explained above, Besaw does not teach all of the limitations for claim 1. Sexena does not satisfy the deficiencies of Besaw. Therefore, claim 19 should be allowed.

Claims 29, 31, 33, 63, 65 and 67 are rejected under 35 U.S.C. 103(a) as being unpatentable over Besaw in view of Williams. Applicants' respectfully submit that Williams et al. does not satisfy the deficiencies of Besaw. Thus for the reasons recited above with respect to the independent claims to which these claims depend, claims 29, 31, 33, 63, 65 and 67 should be allowed.

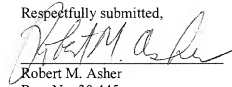
Claims 36 and 70 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Besaw in view of Reddy. Besaw does not disclose or suggest the use of questions. Given the absence of such a question and answer expert system, Applicants find no motivation to

combine Besaw with teachings of Reddy. The examiner argues that the teachings of Reddy would provide a more relative line of questioning. But Besaw does not suggest the use of questions in the first place, thus there is no incentive to look to Reddy. Applicants submit that there is no suggestion, motivation or incentive to combine Reddy and Besaw. For these additional reasons, claims 36 and 70 should be allowed.

Claims 38 and 72 are rejected under 35 U.S.C. 103(a) as being unpatentable over Besaw in view of Suchoff. Suchoff does not satisfy the deficiencies of Besaw with respect to claim 1. Thus, for the reasons set forth above, claims 38 and 72 should be allowed.

For all foregoing reasons, Applicants submit that all claims present in the application are patentable over the art of record and early notice to that effect is respectfully solicited. Any questions as to the patentability of these claims should be directed to Applicants' counsel set forth below.

Respectfully submitted,



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